

Subject: Public Comment: RULES GOVERNING THE ENROLLMENT OF CHILDREN OF MILITARY FAMILIES
Date: Monday, April 20, 2020 at 2:04:42 PM Central Daylight Time
From: DK Berry
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CC: Jennifer Dedman (ADE), MaryClaire.Hyatt@Arkansas.gov
Attachments: Arkansas Veterans Coalition Suggested Changes to DESE Proposed Rules -- 20 apr 2020.docx

Ms. Hyatt -- Attached are the Arkansas Veterans Coalition's public comments on the pending **DESE Rules Governing the Enrollment of Children of Military Families**.

Background—

Military families seek continuity and stability for their children's education. Military dependent students may transfer six or more times during their elementary and secondary education years. Transfers have considerable disruptive impact on continuity, coursework and ultimately their education success. In 2013 Arkansas adopted the then 5-year old the Interstate Compact for on Educational Opportunity for Military Children (MIC3). While well intended the compact provisions set in statutory concrete what was 'enactable' across the implementing states – provisions that states and their districts were already doing for all students. The compact does not provide means to ever raise the bar.

Act 939 substantially enhances transition support provisions provided military dependent students over the Interstate Compact for on Educational Opportunity for Military Children (MIC3). For this we have our legislature and especially DESE leadership and counsel to thank.

Arkansas is the only state to have established provisions supporting members of the reserve component, provide transitioning students with advance enrollment, and to direct public school districts to designate military education coordinators where they have a large number of military students enrolled. While we remain a member of the interstate compact Arkansas is untethered from its basic provisions unchanged since it was formed in 2008.

Act 939 also amended a number of provisions related to our state council which oversees our state administration of the compact provisions and now also the parallel provisions in **§§ 6-18-107. Enrollment of children of military families.**

These DESE proposed rules implementing Act939 provisions will likely become the model other states turn to as a reference along w the legislation that brought them about.

Thank you on behalf of military families whose children attend school here ... and also those children of families to be stationed here in the future. We are very proud of what we have done together to make such an important effort on

Overall comments on proposed rules --

- Chapter 1 – Scope and Definitions and Chapter 2 – Public School District Duties are excellent directives ... Chapter 2 especially.
 - Structure and clarity of proposed DESE rules are clear, organized.
 - Only a few comments, suggested changes.
 - District guidance will be easy for districts and the public to follow.

- The §§ 6-18-107 based DESE proposed rules provide better, clearer, more complete direction than the MIC3 rules for the identical provisions codified in §§ 6-4-302.
- Chapter 3 –State Council guidance.
 - Chapter 3 direction suffers from often disorganized guidance in §§ 6-4-304, -305.
 - A number of suggested changes
- When DESE Rules are adopted recommend DESE remove the MIC3 Rules posted on the DESE Military Families webpage.
 - Provisions of §§ 6-18-107 and DESE rules address every provision in the compact model statute §§ 6-4-302.
 - MIC3 Rules applying to public school districts are more effectively presented by DESE. Removing the MIC3 rules from public view precludes districts and the public from being confused when direction or information provided differ.

Please consider amending proposed **Rules Governing the Enrollment of Children of Military Families** based on our inputs and rationale in the attached. Please contact me if I can assist in crafting final language.

The Arkansas Veterans Coalition advocates on behalf of the 14 thousand current and 220 thousand former service members and their families here in Arkansas.

Thank you for the opportunity to comment and thank you again for DESE support of all military families. We've raised the bar for the entire country.

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